

1 GAYLE A. KERN, ESQ.

Nevada Bar No. 1620

2 KAREN M. AYARBE, ESQ.

3 Nevada Bar No. 3358

LEACH KERN GRUCHOW

4 **ANDERSON SONG**

5 5421 Kietzke Lane, Ste. 200

Reno, Nevada 89511

6 Tel: (775) 324-5930

Fax: (775) 324-6173

7 Email: kayarbe@lkglawfirm.com

8 *Attorneys for Defendant, Highland Ranch Homeowners Association*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 BANK OF AMERICA, N.A., as successor by
12 merger to BAC HOME LOANS
13 SERVICING, LP f/k/a COUNTRYWIDE
HOME LOANS SERVICING, LP,

14 Plaintiff,

15 vs.

16 HIGHLAND RANCH HOMEOWNERS
17 ASSOCIATION; LVDG LLC SERIES 141
18 a/k/a LVDG SERIES 141; THUNDER
19 PROPERTIES, INC.; ALESSI & KOENIG,
LLC,

20 Defendants.
21 _____/

Case No.: 3:16-cv-00154-MMD-VPC

***STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
OPPOSITIONS TO PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT AND TO SET DEADLINE
FOR REPLY BRIEFS.***

[First Request]

22 ***IT IS HEREBY STIPULATED*** between Plaintiff BANK OF AMERICA N.A.
23 (“BANA”), by and through its respective counsel, Akerman LLP, Defendants, LVDG LLC
24 SERIES 141 (“LVDG”) and THUNDER PROPERTIES, INC. (“TPI”), by and through their
25 respective counsel, Roger P. Croteau & Associates, Ltd., and Defendant, HIGHLAND RANCH
26 HOMEOWNERS ASSOCIATION (the “Association”), by and through its counsel Leach Kern
27 Gruchow Anderson Song, collectively referred to as the Parties, to extend the deadline for the
28

1 Association, LVDG, and TPI to oppose BANA's January 7, 2019 Motion for Partial Summary
2 Judgment ("Motion" at DE 60) to February 11, 2019.

3 The current deadline for the Association, LVDG, and TPI to oppose BANA's Motion is
4 currently January 28, 2019. Good cause exists to extend the deadline, as the extension will allow
5 the Parties' counsel an opportunity to review more fully the points and authorities raised in
6 BANA's Motion, to further discuss possible settlement, and to respond thereto if settlement does
7 not occur.

8
9 In order to coordinate the briefing schedule with respect to BANA's Motion, the Parties
10 also stipulate that BANA may have up to and including March 4, 2019 to file a Reply in support
11 of its Motion. This is the Parties' first request for an extension and to set a deadline for the filing
12 of any reply briefs and is not intended to cause any delay or prejudice to any party.
13

14 DATED this 28th day of January 2019.

DATED this 28th day of January 2019.

15 ***KERN & ASSOCIATES, LTD.***

AKERMAN, LLP

16 /s/ Karen M. Ayarbe, Esq.

/s/ Jamie K. Combs, Esq.

17 KAREN M. AYARBE, ESQ.

JAMIE K. COMBS, ESQ.

18 Nevada Bar No. 3358

Nevada Bar No. 13088

19 5421 Kietzke Lane, Ste. 200

1635 Village Center Circle, Ste. 200

20 Reno, NV 89511

Las Vegas, NV 89134

21 Tel: (775) 324-5930

Tel: (702) 634-5000

22 *Attorneys for Defendant*

Attorney for Plaintiffs

23 *Highland Ranch Homeowners Association*

Bank of America, N.A.

24 DATED this 28th day of January 2019.

25 ***ROGER P. CROTEAU & ASSOCIATES, LTD.***

26 /s/ Timothy E. Rhoda, Esq.

27 TIMOTHY E. RHODA, ESQ.

28 Nevada Bar No. 7878

9120 West Post Road, Ste. 100

Las Vegas, NV 89148

Tel: (702) 254-7775

Attorney for Defendants

LVDG, LLC [SERIES 141]

and Thunder Properties, Inc.

1
2 **ORDER**

3 ***IT IS SO ORDERED*** in the above-captioned case (Case No.: 3:16-cv-00154-MMD-
4 CBC).

5 DATED this 28th day of January 2019.

6
7
8 

UNITED STATES DISTRICT JUDGE

9 ***Respectfully Submitted By:***

10 /s/ Karen M. Ayarbe, Esq.

11 KAREN M. AYARBE, ESQ.

12 Nevada Bar No. 3358

13 5421 Kietzke Lane, Ste. 200

14 Reno, NV 89511

15 Tel: (775) 324-5930

16 *Attorneys for Defendant*

17 *Highland Ranch Homeowners Association*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure 5(b), I certify that on the 28th day of January 2019, I served via the CM/ECF electronic filing system, and in accord with Local Rule IC 4-1(b) of the United States District Court for the District of Nevada, a true and correct copy of the ***STIPULATION AND ORDER TO EXTEND DEADLINE FOR OPPOSITIONS TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT AND TO SET DEADLINE FOR REPLY BRIEFS***, to the attorneys associated with this case as follows:

Jamie K Combs	jamie.combs@akerman.com jennifer.richardson@akerman.com erin.abugow@akerman.com akermanlas@akerman.com elizabeth.streible@akerman.com tracey.wayne@akerman.com brienne.siriwan@akerman.com
---------------	--

Roger P. Croteau	croteaulaw@croteaulaw.com receptionist@croteaulaw.com
------------------	--

William S. Habdas	william.habdas@akerman.com jennifer.richardson@akerman.com erin.abugow@akerman.com akermanlas@akerman.com tracey.wayne@akerman.com
-------------------	--

Steven T. Loizzi, Jr	eserve@nrs116.com steve@nrs116.com jona@nrs116.com
----------------------	--

Jeanette E. McPherson	bkfilings@s-mlaw.com
-----------------------	----------------------

Melanie D Morgan	melanie.morgan@akerman.com jennifer.richardson@akerman.com erin.abugow@akerman.com akermanlas@akerman.com tracey.wayne@akerman.com
------------------	--

Timothy Rhoda	croteaulaw@croteaulaw.com receptionist@croteaulaw.com
---------------	--

/s/ Christine A. Lamia
An Employee of Leach Kern Gruchow Anderson Song